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February 14, 2024

**VIA EMAIL:** [tjb\\_orders@njd.uscourts.gov](mailto:tjb_orders@njd.uscourts.gov)

Honorable Tonianne J. Bongiovanni, U.S.M.J  
 U.S. District Court, District of New Jersey  
 Clarkson S. Fisher Building & U.S. Courthouse  
 402 East State Street  
 Trenton, NJ 08608

**Re:** *Doe v. Princeton University, et al.*  
**Case No. 3:19-cv-07853-RK-TJB**

Dear Your Honor:

Please be advised, the undersigned represents Plaintiff John Doe in the above-referenced matter. The undersigned writes jointly with counsel for Defendants to provide a status update.

The mediation held with Judge Hochberg was unsuccessful and counsel for the parties will proceed to discovery in accordance with the following proposed discovery plan respectfully submitted pursuant to the Court's text order on January 16, 2024.

Initial disclosure pursuant to Rule 26(a)(1) must be completed by:	March 13, 2024
Initial requests for production of documents and for interrogatories must be served by:	May 16, 2024
Telephonic Conference	<i>June 12, 2024 at 10 AM</i>
Non-expert depositions must be completed by:	July 31, 2024
All fact discovery must be completed by:	August 30, 2024
Initial expert disclosures:	September 30, 2024
Rebuttal expert disclosures:	October 28, 2024
Close of expert discovery:	November 6, 2024
Deadline for dispositive motions	December 18, 2024
Deadline for oppositions to dispositive motions	February 12, 2024
Deadline for replies in support of dispositive motions	March 12, 2024

*Proposed dates  
to be addressed  
prior to filing*

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*To be addressed  
prior to filing*

*February 15, 2024*

*APB*

*To be addressed  
prior to filing*



Respectfully submitted,

**NESENNOFF & MILTENBERG, LLP**

By: */s/ Helen Setton*  
Helen Setton, Esq.

cc: Counsel of Record